

JEFFREY S. HOSKINS
602 Old Riverside Road
Baltimore, MD 21225

v.

Plaintiff

WAL-MART STORES EAST, LP dba
Dba WAL-MART SUPERCENTER
SERVE-ON
The Corporation Trust, Inc.
2405 York Road, Suite 201
Lutherville-Timonium, MD 21093

Defendant

IN THE

CIRCUIT COURT

OF MARYLAND

FOR ANNE ARUNDEL COUNTY

Case No:

COMPLAINT AND PRAYER FOR JURY TRIAL

COMES NOW the Plaintiff Jeffrey S. Hoskins, by his attorneys, Samuel O. Cole and the Law Office of David Ellin, P.C. and sues Wal-Mart Stores East, LP dba Wal-Mart Supercenter (hereinafter referred to as "Defendant Corporation") and states as follows:

1. The Plaintiff is a resident of Baltimore City, Maryland.
2. The Defendant is a corporation which regularly conducts business in and around the State of Maryland, including Anne Arundel County, Maryland.
3. The occurrence which is the subject of this lawsuit occurred in Anne Arundel County, Maryland.
4. Venue is claimed in Anne Arundel County, Maryland.
5. On or about October 22, 2018, Plaintiff Hoskins was carefully and lawfully walking in the parking lot of the Wal-Mart Supercenter located at 407 George Claus Boulevard, Severn, MD 21144. Plaintiff Hoskins was a customer of the Defendant Corporation on the date of this incident.

6. Suddenly and without warning, Plaintiff fell as the result of an unmarked, uncovered hole in the ground, which was negligently allowed to remain in a dangerous and defective condition by agents; servants; employees; and/or servants of the Defendant Corporation.

7. As a result of the fall and negligence complained of hereinabove, the Plaintiff suffered significant and severe injuries which necessitated medical evaluation and treatment.

8. The Defendant Corporation, through its agents, servants, and/or employees, knew or should have known of the unsafe, hazardous, defective and dangerous condition existing in the parking lot, which it at all times, through its agents, servants, employees and/or representatives, owned, managed, and/or otherwise controlled on the day of the incident described hereinabove, and negligently failed to eliminate said dangerous conditions or to warn the Plaintiff or other customers or visitors of the existence of potentially dangerous conditions.

9. The Plaintiff's injuries were caused by the carelessness, recklessness and negligence of the Defendant Corporation in that it:

- a. failed to remove or correct the unsafe, dangerous and hazardous condition;
- b. failed to adequately inspect for dangerous conditions;
- c. failed to warn persons of the dangerous and unsafe conditions;
- d. allowed the property to be and remain in an unsafe and dangerous condition;
- e. failed to discover the presence of a dangerous condition; and
- f. was otherwise negligent and careless.

10. As a direct and proximate result of the Defendant Corporation's negligence, the Plaintiff was caused to sustain serious injuries to his person, severe shock to his nerves and

nervous system, and great mental and physical anguish such that he will be and is prevented from engaging in his usual activities, pursuits, and diminishing forever his former sense of well-being and mental health.

11. In addition, the Plaintiff incurred medical expenses and other expenses.

12. As a direct and proximate result of the negligence of the Defendant Corporation, the Plaintiff suffered severe physical pain and emotional pain as well as economic losses, and claim is made against the Defendant Corporation herein by the Plaintiff for these damages and losses.

13. All of the injuries described hereinabove were caused solely by the actions of the Defendant Corporation with no negligence whatsoever on behalf of the Plaintiff.

WHEREFORE this suit is brought and the Plaintiff claims damages against the Defendant Wal-Mart Stores East, LP dba Wal-Mart Supercenter in an amount exceeding SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00).

Respectfully submitted,



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Attorneys for the Plaintiff

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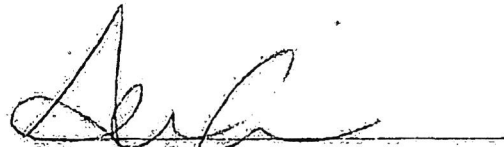
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Plaintiff respectfully prays a jury trial in the above-captioned matter.

Respectfully submitted,



Samuel O. Cole

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Attorneys for the Plaintiff